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BY ECF

Honorable Madeline Cox Arleo
United States District Court
District of New Jersey
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: U.S. v. Adam Brosius, 20-cr-578 (MCA)

Dear Judge Arleo:

We represent defendant Adam Brosius in the above-captioned case (the “NJ Case”) and write to respectfully request, with the consent of both the Government and U.S. Probation, an adjournment of defendant’s sentencing date to a date in late September or October 2025. The current sentencing date is June 1, 2025.

As the Court is aware, in June 2024, Mr. Brosius was charged in a separate federal criminal case in the Southern District of Florida (the “Florida Case”). Thereafter, in September 2024, Mr. Brosius pled guilty in the NJ Case and later, in November 2024, testified at the trial of co-defendant Chad Beene in the NJ Case. On April 18, 2025, Mr. Brosius pled guilty in the Florida Case. Trial with respect to the co-defendants in the Florida Case is set to begin on August 11, 2025. It is anticipated that Mr. Brosius may be called as a witness in that case. Mr. Brosius’s sentencing date in the Florida Case is currently set for August 29, 2025.

Based on the upcoming activity in Mr. Brosius’s Florida Case and the potential that Mr. Brosius may be needed to testify in that case, we request an adjournment of his sentencing date in the NJ Case to a date in September or October 2025 after the trial in the Florida Case concludes. This adjournment will permit Mr. Brosius to testify, if needed, and then travel to and prepare for his sentencing in NJ. This adjournment will also allow this Court to take into account Mr. Brosius’s full post-charge assistance in fashioning an appropriate sentence in the NJ Case.

We thank the Court for its consideration of this request.

Respectfully submitted,

ABELL ESKEW LANDAU LLP

/s/

By: DAVID M. ESKEW
Counsel for Adam Brosius